REMARKS

This Amendment is in response to the Office Action of March 26, 2004, in which the Examiner rejected claims 1-30 as allegedly anticipated by Endicott *et al.* The Examiner's rejection of the claims is respectfully traversed for the reasons set forth below.

The claims have been rewritten in order to present the subject matter of the invention in a form which is believed to fully distinguish over the cited reference. Indeed, the claims have been amended in order to more clearly focus the claim language and to simplify the presentation. The newly presented claims 31-34 are method claims; claim 35 is a system claim; and claims 36-38 are computer program claims.

The newly presented claims are believed to overcome Endicott as discussed hereinafter.

Endicott does not appear to disclose or suggest automatic control of real world entities such that at least one object instance created in accordance with the independent clams would be changed. There is no suggestion that in accordance with such change, a function for controlling a real world entity is adapted to the relationship of the object instance of other object instances in at least one of the resultant structures. As a result, the control of the corresponding real world entity would not be adapted to the relationship of said entity of other entities.

The applicant submits that in the prior art control systems, such as Endicott, it is difficult, if not impossible, to describe relationships between object instances in more than one dimension. The prior art systems provide no automatic mechanism for describing such relationships, and especially for describing such relationships for composite object types, and then performing automatic control operations based on the descriptions.

This is facilitated in the present invention wherein it is possible to describe how instances of objects representing real world entities such as entities of industrial processes can be located in different structures when composite object types are instantiated i.e., the creation of an instance to be used by the computer system. Furthermore, the invention makes it possible to describe, in an object type, the way the resulting object instances shall be changed when the object type is instantiated. The invention makes it possible to describe and define how a function for controlling a real object for a real instance should be adjusted to be in conformity with the way the object instance is located in relation to other object instances within different structures.

6

In other words, the invention enables the automatic control systems to take into account relations a controlled real world entity has with other real world entities. The invention also provides significant advantages. For example, time can be saved while programming the required software for a control system. Further, better quality of programming results, which is more responsive to the real life situation. These advantages are not available in the prior art.

For the above reasons, the dependent claims are also believed to be patentable.

In view of the foregoing, it is respectfully requested that the Examiner reconsider his rejection of the claims, the allowance which is earnestly solicited.

If filing this paper or any accompanying papers necessitates additional fees not otherwise provided for, the undersigned authorizes the Commissioner to deduct such additional fees from Deposit Account No. 04-2223.

Respectfully submitted,

DYKEMA GOSSETT PLLC

John P. DeLuca, Registration No. 25,505
Attorney for Applicants

DYKEMA GOSSETT PLLC
1300 I Street, N. W.
Suite 300 West
Washington, D.C. 20005
Tel. No.: (202) 906-8600

7